

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

THREE BROTHERS TRADING, LLC, d/b/a
ALTERNATIVE EXECUTION GROUP,

Petitioner,

v.

GENEREX BIOTECHNOLOGY CORP.

Respondent.

Civil Action No. 18-CV-11585 (KPF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law dated November 5th 2021, the Declaration of Richard Alter dated November 5th 2021, and upon all prior papers and proceedings herein, Petitioner THREE BROTHERS TRADING, LLC, d/b/a ALTERNATIVE EXECUTION GROUP (“AEXG”), by its attorneys Shaub, Ahmuty, Citrin & Spratt, LLP, will move this Court, before the Honorable Katherine Polk Failla, United States District Judge, at the Thurgood Marshall United States Courthouse located at 40 Foley Square, Courtroom 618, New York, NY 10007, on December 3, 2021 at 10:00 a.m. or as soon thereafter as counsel may be heard, for an Order: (1) granting AEXG’s application for the appointment of a receiver with broad powers to liquidate assets for the satisfaction of AEXG’s Judgment, or in the alternative to satisfy the claims of all of Generex’s *bona fide* creditors; (2) awarding AEXG attorney’s fees in pursuing enforcement of its judgment; and (3) granting such other and different relief to AEXG as the Court deems just and proper.

Dated: November 5, 2021
Lake Success, New York

SHAUB, AHMUTY, CITRIN & SPRATT LLP

/s/John F. Watkins
John F. Watkins

Sofya Uvaydov
Payne T. Tatich
1983 Marcus Avenue
Lake Success, New York 11042
(516) 488-3300
(516) 488-2324 (fax)
jwatkins@sacslaw.com
suvaydov@sacslaw.com
ptatich@sacslaw.com

Counsel for Petitioner